

**Abdul Hassan Law Group, PLLC**  
**215-28 Hillside Avenue**  
**Queens Village, New York, 11427**

Abdul K. Hassan, Esq.  
Email: abdul@abdulhassan.com  
*Employment and Labor Lawyer*

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**MEMO ENDORSED**

Tel: 718-740-1000  
Fax: 718-740-2000  
Web: www.abdulhassan.com

**December 16, 2020**

**Via ECF**

Hon. Valerie E. Caproni, USDJ  
United States District Court, SDNY  
40 Foley Square, Courtroom 443  
New York, NY 10007  
Tel: 212-805-6350

USDC SDNY  
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**Re: Hughes v. Love Conquers All Inc. et al**  
**Case #: 20-CV-02697 (VEC)(KNF)**  
**Motion for Extension of Time**

Dear Judge Caproni:

My firm represents plaintiff in the above-referenced action and I respectfully write to request a thirty-day extension of the December 16, 2020 deadline for Plaintiff to submit his declaration/affidavit as per the Court's November 23, 2020 order. This second request for an extension of the subject deadline is being made because of certain compelling unforeseen circumstances.

In this regard, my office was last in communication with Plaintiff on October 6, 2020 as I was finalizing the default judgment motion papers. On or about October 7, 2020, Plaintiff had a domestic/police situation one consequence of which was separation from his residence, belongings and family situation. As such, we have been unable to contact Plaintiff but have made progress through the use of an investigator. It is not uncommon for my office to lose contact with my office from time to time for these and other reasons but in almost every case, we are able to reconnect with some additional time and accommodation. One prior request for an extension of this deadline was made and granted.

We apologize for any inconvenience and thank the Court in advance for its time and consideration.

Respectfully Submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan  
By: Abdul K. Hassan, Esq. (AH6510)  
*Counsel for Plaintiff Kevin Hughes*

Application GRANTED. Plaintiff's affidavit is due by **January 15, 2021**. No further extensions will be granted. If Plaintiff fails to submit the affidavit by **January 15, 2021**, this case will be dismissed for failure to prosecute.

SO ORDERED.



HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

12/17/2020